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Sent: Friday, October 15, 2021 9:33 PM

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Subject: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

Emily and Gabi,

In November 2018, a Dropbox account belonging to John Fawcett was used to serve on Saudi Arabia the exhibits to Plaintiffs' November 30, 2018 motion to compel Saudi Arabia to produce certain documents. The exhibits included materials that had been designated as confidential by Saudi Arabia pursuant to the MDL protective order, ECF No. 1900, some of which were later sealed by order of the court, ECF No. 4696.

Earlier this afternoon, it came to our attention that the shared folder still exists, still has confidential material in it, and still has John Fawcett listed as the owner. I have attached a screenshot showing the current existence, partial contents, and ownership of the Dropbox folder.

Emily, your client has previously represented to Judge Netburn that "upon learning of the breach, [it] immediately acted to remove the consultant from access to confidential materials." ECF No. 7162, at 1. Please confirm that Mr. Fawcett no longer has access to any material designated as confidential by Saudi Arabia, through the Dropbox account linked to jfawcett@kreindler.com, any personal or Kreindler & Kreindler LLP ("Kreindler & Kreindler") device, in hard copy, or by any other means.

Gabi, please confirm that on behalf of Mr. Fawcett as well.

If Kreindler & Kreindler and Mr. Fawcett are unable or unwilling to provide the confirmations requested above, Saudi Arabia will seek an order from the Court requiring Mr. Fawcett immediately to return all of Saudi Arabia's confidential materials in his possession either to Kreindler & Kreindler or to his counsel; to relinquish to Kreindler & Kreindler control of or access to any account, including but not limited to the Dropbox account linked to jfawcett@kreindler.com, that would allow him to access such materials; and to file a sworn certification of compliance with the Court.

Please let us know your clients' position on these requests before the close of business on Monday, October 18. We would like to resolve this matter without going to the Court, but want to get a meet-and-confer session on the calendar promptly if needed.

Regards,

Greg

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